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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of
Pacific Gas and Electric Company for
Approval of its Electric Vehicle
Infrastructure and Education Program (U39E).

Application 15-02-009
(Filed February 9, 2015)

MOTION OF EMETER, A SIEMENS BUSINESS TO BECOME A PARTY

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March 28, 2016

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I. INTRODUCTION

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, eMeter, A Siemens Business (hereinafter, "eMeter") respectfully files this motion in the above-captioned Application.

II. BASIS FOR MOTION

A. Background eMeter

Siemens AG is a global technology company with focus on electrification, automation and digitalization. eMeter is a U.S. subsidiary of Siemens, whose product portfolio includes electric vehicle charging equipment, electric vehicle charging management software, and electric vehicle data management software.

B. eMeter Interest in this Application

eMeter and its parent company, Siemens, have a strong interest in the development of effective policies that will enable electric vehicle integration as the California grid evolves towards a Smarter Grid. In addition, eMeter has a direct business interest in this proceeding, because eMeter offers products and services in the California electric vehicle charging market. By defining the terms of Pacific Gas and Electric's ("PG&E's") electric vehicle charging program, the Commission's decision in this proceeding will have a significant and direct effect on eMeter's ability to participate in California's electric vehicle charging market.

C. Relationship to Previous Motion

eMeter filed for Party Status in this proceeding on October 6, 2015. The Commission denied the motion on January 14, 2016, stating that that eMeter did not state "the factual and legal contentions that it intends to make or in any way say how (or even that) it plans to participate in the proceeding." Now, eMeter intends to contend that technology exists from different vendors and is available in the market for PG&E to implement its electric vehicle charging plans. eMeter intends to participate in this proceeding by participating in settlement discussions and filing comments on the proposed settlement that has been filed.

With the settlement now filed and pending, eMeter has a strong interest as a vendor and electric vehicle charging market participant in commenting on the proposed settlement and providing

input on the Commission's overall consideration of the issues associated with the settlement. Aside from eMeter's basic interest in the settlement, the settlement itself provides a significantly different proposal from PG&E's original proposals. Therefore, eMeter should have an opportunity to comment on the settlement and participate as a party in the proceeding because of the new and different elements in the settlement that replace PG&E's prior proposals in the proceeding.

eMeter's failure to intervene earlier should not preclude the Commission allowing it to intervene now in response to the settlement, while comments and views on the settlement are still timely and pending, and no party or the Commission would be prejudiced by Siemens participating in the consideration of the settlement.

eMeter, therefore, respectfully requests party status.

III. NOTICES

Service of notices, orders and other correspondence in this proceeding should be directed to eMeter, A Siemens Business at the address set forth below:

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IV. CONCLUSION

For the reasons stated above, eMeter respectfully requests that the Commission grant this Petition.

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Respectfully submitted,

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Chris S. King

Global Chief Regulatory Officer

on behalf of eMeter, A Siemens Business

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Dated March 28, 2016